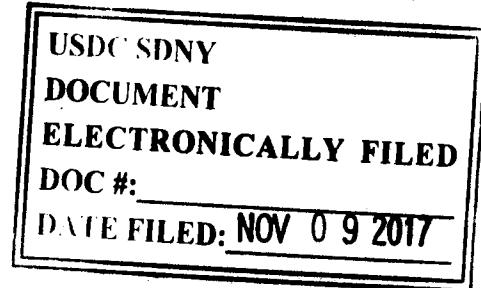


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE UNITED STATES OF AMERICA)
)
Plaintiff,)
)
v.)
)
AVTANDIL KHURTSIDZE et al,)
)
Defendants)
)



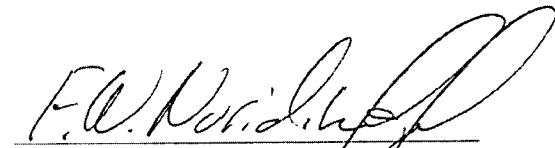
Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

In the matter of *United States v. Avtandil Khurtsidze* (17Cr. 350 KBF)

Your Honor,

I was officially substituted for an outgoing attorney for defendant Avtandil Khurtsidze on November 7, 2017. In view of the time limitations and the attendant factors such as obtaining case file, reviewing initial discovery, multiple meetings with the clients in MDC to discuss objectives and strategy of representation, I find it impossible to comply with your order dated as of 12 September 2017, directing attorneys for the defendants in the above-captioned proceedings to file motions no later than 11/17/2017. Furthermore, I am currently in the process of obtaining from the government an additional discovery which contains 6TB of relevant information. In light of the foregoing, I would like to request an extension of time for filing of Motions until January 15, 2018.

With best regards,



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Ordered

Denizel. You were counsel
on this case before Nov. 7,
2017; you became sole
counsel on that date.

As the Court stated
at the conference, any suppressible
motions of which you could
reasonably be aware need to
be brought by 11/17/17.

Other motions (relating to issues
raised in the GTB) may be
brought later, if necessary.

2/15/18
cc: [redacted]

11/9/17